ILLINOIS
COMMERCE COMMISSION

WorldCom Ex. 2.1

Mel WorldCom v. Illinois Bell

Docket No. 01-0412

September 10, 2001

STATE OF ILLINOIS

#### **ILLINOIS COMMERCE COMMISSION**

MCI WorldCom Communications, Inc.

Docket No. 01-0412 VS.

Illinois Bell Telephone Company, d/b/a Ameritech Illinois

Complaint pursuant to Section 13-514 and 13-515 and other sections of the Illinois Public Utilities Act

REBUTTAL TESTIMONY OF ANDREW M. GRAVES

ON BEHALF OF

MCI WORLDCOM COMMUNICATIONS, INC.

- Q. ARE YOU THE SAME ANDREW M. GRAVES WHO FILED DIRECT
  TESTIMONY IN THIS MATTER?
- 3 A. Yes.

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- Q. AT PAGE 6 OF HER TESTIMONY, AMERITECH WITNESS BRIDGET
  WHITTLE CLAIMS THAT AMERITECH HAS GONE BEYOND THE FCC
  REQUIREMENTS FOR ACCOUNTS WITH PIC PROTECTION BECAUSE IT
  ALLOWS CUSTOMERS TO CHANGE CARRIERS DURING THREE WAY
  CALLS WITHOUT ALSO REQUIRING THE SUBMITTING CARRIER TO
  SEPARATELY SUBMIT A FORMAL CHANGE ORDER THROUGH CARE.
  HOW DO YOU RESPOND?
- Ms. Whittle's testimony has completely ignored the fact that Ameritech is required to 12 follow this approach under Illinois law. As set forth in paragraphs 8 through 10 of the 13 Amended Complaint, on February 13, 1996 WorldCom (then MCI) joined with other 14 carriers to bring a complaint with the Illinois Commerce Commission against Ameritech in 15 16 Docket No. 96-0075 (the "PIC Protection Marketing" case, 1996 Ill.PUC Lexis 205). The Commission's April 3, 1996 order, among other matters, ruled that Ameritech must allow 17 18 three-way conference calls and should not attempt to retain the customer's account during these three-way calls. 19

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Additionally, as set forth in the Amended Complaint at paragraphs 13 through 14, on October 27, 1997 WorldCom brought a complaint against Ameritech in Docket No. 97-0540 (1997 III. PUC Lexis 914), hereinafter referred to as the "Three-Way Calling" case. The Commission in the Three-Way Calling case issued its order on December 17, 1997 which ordered Ameritech to process PIC changes as part of three way calls. The Commission concluded, in part, that during three way calls that "Ameritech representatives may only determine the switching customers' names, telephone numbers and willingness to switch intraMSA and/or interMSA services to another carrier. There is simply nothing more for the Ameritech representatives to do but make the PIC change. The PIC change must be made within 24 hours thereafter." (Id., p. 12)

#### Q: DO YOU HAVE ANY OTHER DISAGREEMENTS WITH MS

#### WHITTLE'S DESCRIPTION OF THREE WAY CALLS?

A:

Yes. Ms. Whittle asserts that when three-way calls are used, carriers avoid the general office queue. However, from the customer's perspective, the length of three-way calls with Ameritech is approximately 7.5 minutes. This is far greater than the 2 minutes 19 seconds referred to by Ms. Whittle at page 22 of her testimony. The difference in timing here is due to the fact that MCI WorldCom must first contact the customer, explain to the customer the purpose of the call, obtain the customer's permission to participate in a three way call, and

- 41 then be placed on hold with Ameritech prior to the Ameritech representative even starts to participate on the call. 42
- Q. MS. WHITTLE AT PAGES 7 THROUGH 8 OF HER TESTIMONY SPECULATES 43 44 THAT ONE REASON WHY THE CUSTOMER SURVEY SHOWS THAT A LARGE NUMBER OF AMERITECH CUSTOMERS WITH PIC PROTECTION 45 ARE UNAWARE IT MIGHT BE DUE TO THE NOMENCLATURE" USED. HOW DO YOU RESPOND? 47
- A. The survey took into account the possibility that the customer might use different words to 48 49 convey the concept of PIC Protection. Still, the responses to question 15 of the survey showed that 79% of the Ameritech Illinois customers either were completely unaware that 50 51 they had a PIC freeze or had forgotten that they had a PIC freeze.

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The responses to survey question 17a (as set forth in Table 19 of the survey results -53 Attachment "AG-B") show that 76% of the Ameritech Illinois customers surveyed knew 54 55 that having a PIC Freeze prevents unauthorized service switches. It is thus readily apparent that most of the Ameritech Illinois customers with PIC Protection know what PIC 56 Protection does, but that most do not believe that it is on their account. Further, as shown by the responses to survey question 17b (as set forth in Table 20 of the survey results), 36% of those who responded affirmatively to question 17a that they knew what a PIC Freeze prevents an unauthorized change in carriers, only became aware of this aspect of a

PIC Freeze after they tried to switch their service to MCI WorldCom.

Similarly, as shown by the responses to survey question 18a (as set forth in Table 22 of the survey results) 80% of the Ameritech Illinois customers surveyed knew that having a PIC Freeze means that long distance companies cannot apply or remove PIC Freezes on behalf of the customer. This gives further support that most of the Ameritech Illinois customers with PIC Protection know what PIC Protection does, but that most do not believe that it is on their account. Further, as shown by the responses to survey question 18b (as set forth in Table 23 of the survey results), 38% of those who responded affirmatively to question 18a that they knew what a PIC Freeze prevents long distance companies from applying or removing PIC Freezes on behalf of the customer, only became aware of this aspect of a PIC Freeze after they tried to switch their service to MCI WorldCom.

As shown by the responses to survey question 19a (as set forth in Table 25 of the survey results) 77% of the Ameritech Illinois customers surveyed knew that to remove a PIC Freeze the customer must contact their local phone company directly. This shows that most of the Ameritech Illinois customers with PIC Protection know what PIC Protection does, but that most do not believe that it is on their account. Further, as shown by the responses to survey question 19b (as set forth in Table 26 of the survey results), 50% of those who responded affirmatively to question 19a that they knew that to remove a PIC Freeze that

they must contact their local phone company directly, only became aware of this aspect of a PIC Freeze after they tried to switch their service to MCI WorldCom.

# Q. AT PAGES 8 THROUGH 10, MS. WHITTLE ATTEMPTS TO DEFEND THE TELEVISION ADS WHICH AMERITECH PLACED FOR PIC PROTECTION. HOW DO YOU RESPOND?

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Ms. Whittle correctly points out that under the FCC rules "all informational material provided to customers" regarding PIC Protection must ". . . provide a clear and neutral explanation of what PIC Protection is, what services it applies to, the procedures for removing it and that these procedures are in addition to other verification requirements mandated by the FCC."

Yet, Ms. Whittle did not even attempt to apply these required standards to the television ads. The ads grossly violate these standards. The ads do not provide a clear and neutral explanation of what PIC Protection is, the ads only assert that PIC Protection applies to local toll service, the ads do not identify any procedures for removing PIC Protection, and the ads do not explain that these procedures are in addition to other verification requirements mandated by the FCC.

I also take issue with the implied assertion in the testimony of Ms. Whittle that one ad only ran in Illinois in the first quarter of 1999 and that the other ad never ran in Illinois. This is

absolutely false. The "Hal's Market" ad, the one which Ameritech failed to produce in discovery and the one which Ms. Whittle appears to assert never ran in Illinois in fact ran extensively in Illinois in 1999. Attached as Attachment "AG\_H" are printouts from Competitrack, Inc., showing various times and television stations that this ad ran in Chicago. This is a company which tracks information of this nature.

The other ad - the "House Slamming" ad, also ran extensively in Chicago. While Ms. Whittle states that the ad "did run in Illinois in the first quarter 1999" (Whittle testimony, page 9) this statement is deceptive. In fact, this ad ran extensively in 1999. Attached as Attachment "AG\_I" are printouts from Competitrack, Inc., showing various times and television stations that this ad ran in Chicago.

I have also recently discovered two print ads of Ameritech which ran in 1999 and which Ameritech failed to produce in response to discovery request 4. (Ameritech's entire response to discovery request 4 is set forth as Attachment "AG-J"). These print ads are attached as Attachments "AG-K" and "AG-L". These print ads contain misleading and incomplete descriptions of PIC Protection, similar to the misleading televised ads. Attached as Attachment "AG-M" are printouts from Competitrack, Inc., showing the various dates these print ads ran in Chicago area publications.

- Docket No. 01-0412 September 10, 2001 MS. WHITTLE'S TESTIMONY (AT PAGES 17-18) CRITICIZES THE USE OF 121 Q. THE WORD "PIC" IN MCI WORLDCOM'S PROPOSED EA SCRIPTING. IS 122 THIS CRITICISM VALID? 123 No. So long as the scripting describes what PIC protection does, most customers will be 124 Α. able to identify it regardless of the particular branding used by Ameritech. 125
- Also, this scripting is not presently carved in stone and can be changed to include the terms "PIC 126 Protection" and "Slamming Protection". MCI WorldCom is willing to work with 127 Ameritech and Illinois Staff on the scripting. 128

NEVERTHELESS, MS. WHITTLE AT PAGE 18 STATES THAT SOME 130 Q. CUSTOMERS MAY BE CONFUSED AND HAVE QUESTIONS DURING THE EA 131 PROCESS. DOES THIS REPRESENT A FLAW IN THE EA PROPOSAL?

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No. MCI WorldCom acknowledges that some customers may have questions despite the A. 133 explanation contained in the scripting. Ms. Whittle suggests that this would place TPV or 134 EA agents in the awkward and perhaps prohibited position of having to further explain the 135 meaning of "PIC freeze." This is not, in fact, the case. If a customer has questions about 136 the meaning of "PIC freeze" the EA agent can use approved scripting to answer these type 137 of questions so long as no marketing is involved. If the customer continues to have 138 questions, the customer will be treated as if he has not agreed to use EA. 139

having a TPV or EA agent mention PIC freezes would be confusing to customers. First, she provides the wrong citation as she references paragraph 41 of the order, but the quotation is from paragraph 42. Second, the quote she includes in her testimony when viewed in context refers to the FCC's views with respect to carriers using TPV agents to discuss their preferred carrier freeze offerings because TPV agents should not be used to market freezes.

42. We further conclude that third party verifiers may not dispense information concerning the carrier or its services, including information regarding preferred carrier freeze procedures or other non-telecommunications services that the carrier may offer to the subscriber. Allowing third party verifiers to effectively market the carrier's services could compromise the third party verifiers' independence and neutrality because verifiers could easily be drawn into presenting the particular market viewpoints of carriers by whom they are retained. In addition, providing the verifier with certain carrier information could result in the disclosure of proprietary information to competing carriers. We also believe that incorporating information about preferred carrier freezes into the verification script is likely to be confusing and would prolong the verification process unnecessarily.

(Third Report and Order on Reconsideration, CC Docket No. 94-129, FCC 00-255, ¶ 42). The FCC in its discussion here is not talking about a simple confirmation that a customer wishes to lift a freeze.

## Q. IS IT NECESSARY FOR THE EA SCRIPTING TO DISCUSS INTRA AND INTERMSA PIC FREEZES SEPARATELY?

No. If a customer has asked to change only one type of service, the script can reasonably be interpreted to apply only to the relevant freeze. If the customer has asked to switch more than one service, it can reasonably be interpreted to apply to all affected services. If the Commission believes that more defined language would be helpful, however, MCI WorldCom has no objection to making appropriate changes. I disagree with Ms. Whittle's suggestion that this cannot be accomplished without generating undue customer confusion.

Q. DO YOU AGREE WITH MS. WHITTLE WHERE AT PAGES 18-19 SHE STATES
THAT A CUSTOMER MAY BE BETTER SERVED IF THE ACCOUNT REMAINS
SUBJECT TO PIC PROTECTION AFTER A CARRIER SWITCH IS
ACCOMPLISHED THROUGH EA?

A. MCI WorldCom would not object to the freeze remaining on the customer's account after the carrier change has been completed and is willing to alter its scripting to make this clear.

- Q. MS. WHITTLE AT PAGES 21 THROUGH 22 HAS SEVERAL COMMENTS ON THE EA TRIAL CONDUCTED IN FLORIDA. HOW DO YOU RESPOND?
- 184 A. Ms. Whittle's testimony misstates the facts.

The Florida EA test was a great success. Ms. Whittle is wrong in stating that 70 orders (or

40% of the orders) were originally rejected. These 70 orders did not qualify for the test because the customer was already switched to their carrier of choice through normal processes. During this test, MCI WorldCom kept its normal processes in place. These normal processes included sending a postcard to all customers who had agreed to switch to MCI WorldCom and attempting three way calls. Also, some customers on their own called the local carrier to have the change in carriers implemented.

Ms. Whittle is correct that these customers were likely "frustrated" by the delay. This is why we need EA to allow customer choice to be implemented. While there were some delays in getting the .wav files to the local carrier at the beginning of the test, this was soon corrected and would not be an issue for a full scale operation in Illinois.

Ms. Whittle is also incorrect in implying that 32 of the 90 .wav files which were processed by the local carrier are of the type of files which Ameritech would not be required to process if it were ordered to implement EA. The local carrier in the test referred to these 32 files as files which it did process but in hindsight asserted that it should not have processed. The reason for this statement were the terms of the Florida EA test which provided that the social security number was to be provided (or last four digits of the social security number). In these 32 files the customer provided other identifying information such as the commonly accepted date of birth. (In fact the test plan was

somewhat ambiguous as the title above this portion of the script refers to "DOB" meaning date of birth as something that would be accepted). If EA were to be implemented in Illinois, Ameritech would be required to accept either the social security number, last four digits of the social security number, or date of birth as appropriate identifying information. Thus, under the business rules which would be in place in Illinois, these 32 files would have been properly processed.

Ms. Whittle is also incorrect in stating that because two customers claimed that their change was unauthorized that the EA did not work. As set forth in the August 29, 2001, Reuters newswire, quoting an FCC official (inaccurately referred to by Ms. Whittle as the August 30, 2001 FCC Press Release), "'It's important to note just because someone has made a complaint does not mean there's been wrongdoing on behalf of a carrier." Here the .wav file provides objective evidence of the customer's desire to change carriers. The recording should control over the bare allegation of a forgetful customer. Both of these installations were in fact authorized.

Ms. Whittle is also incorrect in stating that EA is unreliable because some limited number of the .wav files were not sent to the local carrier because a.) the files hard to hear, b.) static was on the line, c.) customer comprehension was questionable, or d.) the .wav file was outdated. She says that because of this EA is "clearly not ready for prime time." While

a certain number of files were not sent to the local carrier in the test on these grounds, this only shows that EA is working. The fact that some limited number of files were hard to hear or had static would be similar to a written LOA which is illegible. The remedy there would be to not process the LOA. Under the Ameritech reasoning, all LOAs should be outlawed because some are illegible. Ameritech is clearly out of step with reality.

The fact that customer comprehension was questioned by MCI WorldCom further shows the validity of EA as it prevents questionable authorizations from being processed.

Finally, the fact that certain .wav files were outdated was a condition early in the test which was corrected later in the test. It is also strange that Ameritech should be complaining about situations where EA files were not sent to the local carrier. Its concern about not receiving enough .wav files suggests that Ameritech can handle full implementation of EA.

Ms. Whittle also complains about the length of the .wav files of nearly 4 minutes compared to Ameritech's statement that the length of its three-way calls is 2 minutes and 19 seconds. She again is using misleading statistics. Her statistics only measure the length of time that the Ameritech representative is on the telephone. The entire length of three way calls with Ameritech Illinois from the customer's perspective (from the time MCI WorldCom initiates the call with the customer, and including hold time with Ameritech) averages 7.5

minutes. This is in addition to the time previously spent by the customer on the prior TPV call, which averages minutes. EA thus saves the customers time and helps to have the customer in control of the situation. Also, as the survey showed, most customers prefer EA. Those who do not want to use EA are not forced to use it.

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Ms. Whittle's statement at pages 22-23 about additional Ameritech representative time being required to report back the results on the status of the .wav file review is also misinformed. This was only a requirement for the test, and most tests have similar steps of this nature. Once EA is in production, the parties can use the present CARE procedures to report on any PIC changes. Ameritech would send a confirmation if the .wav file were accepted. Ameritech would send a 2166 (reject based on PIC Protection) if the .wav file were appropriately rejected.

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What Ameritech has ignored is that the EA test was overwhelmingly successful with 81% of the customer's who initially had their PIC choice rejected due to PIC Protection having their choice appropriately implemented. (See page 6 of Attachment "AG-N", the MCI WorldCom final report on the EA test.

AT PAGES 19-20 MS. WHITTLE CLAIMS THAT EA MIGHT RESULT IN 264 0. 265

FRAUD BECAUSE AMERITECH HAS NO WAY OF KNOWING WHEN THE

.WAV FILE WAS RECORDED AND AMERITECH EQUIPMENT IS NOT BEING

#### USED TO MAKE THE RECORDINGS. HOW DO YOU RESPOND?

A. The EA agent can have the .wav files marked with a date and time stamp. This will show Ameritech when the customer provided the authorization.

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I am also surprised the Ameritech is now claiming that one of its objections is that its own equipment would not be used. In the *Three Way Calling* case (referred to in the Amended Complaint at pages 5-6, paragraphs 13 and 14) Ameritech successfully fought against a proposed requirement that it provide recording equipment as part of the VRU process. EA addresses this ruling by having the EA agent provide the recording at the expense of the interexchange carrier.

- Q. MS. WHITTLE AT PAGE 23 STATES THAT MCI WORLDCOM IS SIMPLY
  SEEKING TO TRANSFER THE ENTIRE BURDEN OF PIC PROTECTION TO
  AMERITECH, BUT THAT THE BURDEN SHOULD BE SHARED EQUALLY.
- 280 **HOW DO YOU RESPOND?**
- She is correct that the burden should be shared, but is incorrect that MCI WorldCom is seeking to transfer the entire burden to Ameritech. MCI WorldCom is going to great lengths and expense to hire the EA agent who will conduct the recordings and send the .wav recordings to Ameritech. This is where the bulk of the expense to be incurred. All that Ameritech has to do is listen to the recordings and then process the appropriate order. This process is easier for customers. Also, this process allows Ameritech to rationalize the use

WorldCom Ex. 2.1 Graves Rebuttal MCI WorldCom v. Illinois Bell Docket No. 01-0412 September 10, 2001 of its service representatives so that instead of handling three way calls during busy periods, it can wait until slower time periods of the day to review the .wav recordings.

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#### DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

291 A. Yes.

#### Jim Denniston

From: Sent:

Jim Denniston [James.Denniston@wcom.com]

Monday, September 10, 2001 1:39 PM

To: Subject: Matthew.Pachman@wcom.com

RE: draft paragraph

Matt,

How does this read?

Jim

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If these technical obstacles and limitations of the VRU could be overcome, Ameritech's proposal would still require the customer to undergo unnecessary and burdensome steps. Customers certainly would not wish to go through a call that could require up to four separate lengthy segments. These segements are as follows:

- A.) The process would begin with the initial sale call. Presently, sales calls to Ameritech customers on average at least 10.1 minutes.
- B.) The customer would then participate in a call to the VRU to determine whether a PIC freeze is in place. The use of the VRU (where it works and where the social security number is embedded) would range from 1.5 minutes to 3.3 minutes (based on my personal observations on September 5, 2001, and depending upon whether the customer did not have PIC Protection or had PIC Protection and needed to lift the PIC Protection).
- C.) The customer would then have to participate in the TPV process which averages from 2.1 to 2.3 minutes.
- D.) Finally, the customer with PIC Protection would have to participate in a three-way call, which, as my colleague Andrew Graves explains in his rebuttal testimony, can take as long as 7.5 minutes.

In sum, use of the VRU (where the VRU works) would force customers with PIC Protection to spend almost 23 minutes (the sum of 10.1 + 3.3 + 2.1 + 7.5) on the phone to switch to MCI WorldCom. If EA were used, on the other hand, the total customer time on the telephone would be about 14.1 minutes (10.1 + about 4 minutes for EA verification).

Rather than exercising the control over their accounts that Ameritech acknowledges is a central goal of PIC Protection, customers using the VRU would feel as if they are being subjected to unnecessary hassles. Again, the EA proposal provides a customer with the greatest degree of control over his account because it allows him or her to be the sole party capable of authorizing his LEC to change his PIC, but does so with the fewest number of steps and in the most convenient manner. It is also a method that works.

						Attachment "AG-H"	
MASTERCOD TITLE	PRODUCT_NAME		STATION_NAM		-	PROGRAM_NAME	COST
AMERTL-2049 Hals Market	_	_	WBBM	20-Jan-99		10 PM Local News	3.9
AMERTL-2049 Hals Market	_	-	WBBM	22-Jan-99		10 PM Local News	4.3
AMERTL-2049 Hals Market	-	_	WBBM	28-Jan-99		10 PM Local News	3
AMERTL-2049 Hals Market	•	_	WBBM	16-Feb-99	18.59	Entertainment Tonight	5.5
AMERTL-2049 Hals Market		-	WBBM	21-Feb-99		60 Minutes-Weekend	8.2
AMERTL-2049 Hals Market	=	_	WBBM	28-Feb-99		Touched By An Angel	9.9
AMERTL-2049 Hals Market			WBBM	14-Mar-99	9:55	Sunday Morning	0.9
AMERTL-2049 Hals Market			WFLD	24-Jan-99	21:18	9 PM Local News	5.9
AMERTL-2049 Hals Market			WFLD	3-Feb-99	7:14	Fox: Thing In The Morning	0.4
AMERTL-2049 Hals Market			WFLD	5-Feb-99	21:10	9 PM Local News	4.4
AMERTL-2049 Hals Market			WFLD	8-Feb-99	7:29	Fox: Thing In The Morning	0.4
AMERTL-2049 Hals Market			WFLD	9-Feb-99	7:53	Fox: Thing In The Morning	0.4
AMERTL-2049 Hals Market	t Slamming Protectio	Chicago*	WFLD	10-Feb-99	21:13	9 PM Local News	6.4
AMERTL-2049 Hals Market	t Slamming Protectio	Chicago*	WFLD	16-Feb-99	21:39	9 PM Local News	3.8
AMERTL-2049 Hals Market	t Slamming Protectio	Chicago*	WFLD	19-Feb-99	21:53	9 PM Local News	2.8
AMERTL-2049 Hals Market	t Slamming Protectio	Chicago*	WFLD	21-Feb-99	21:33	9 PM Local News	6
AMERTL-2049 Hals Market	t Slamming Protectio	Chicago*	WFLD	23-Feb-99	21:36	9 PM Local News	3.5
AMERTL-2049 Hals Market			WFLD	26-Feb-99	21:18	9 PM Local News	6.7
AMERTL-2049 Hals Market			WFLD	28-Feb-99	21:57	9 PM Local News	5.7
AMERTL-2049 Hals Market			WFLD	2-Mar-99	21:20	9 PM Local News	7.4
AMERTL-2049 Hals Market	t Slamming Protectio	Chicago*	WFLD	2-Mar-99	21:56	9 PM Local News	5.7
AMERTL-2049 Hals Market	t Slamming Protectio	Chicago*	WFLD	4-Mar-99	21:57	9 PM Local News	7
AMERTL-2049 Hals Market	t Slamming Protectio	Chicago*	WFLD	5-Mar-99	21:47	9 PM Local News	4.6
AMERTL-2049 Hals Marke	t Slamming Protectio	Chicago*	WFLD	6-Mar-99	21:57	9 PM Local News	4.9
AMERTL-2049 Hals Marke	t Slamming Protectio	Chicago*	WFLD	7-Mar-99	21:56	9 PM Local News	5.7
AMERTL-2049 Hals Marke	t Slamming Protectio	Chicago*	WFLD	14-Mar-99	21:38	9 PM Loçal News	4.8
AMERTL-2049 Hals Marke	t Slamming Protectio	Chicago*	WGN	22-Jan-99	19:46	Gospel Show	1.1
AMERTL-2049 Hals Marke	t Slamming Protectio	Chicago*	WGN	22-Jan-99	21:52	9 PM Local News	1.9
AMERTL-2049 Hals Market	t Slamming Protectio	Chicago*	WGN	23-Jan-99	18:11	Friends	2.9
AMERTL-2049 Hals Marke	t Slamming Protectio	Chicago*	WGN	23-Jan-99	19:27	Saturday Night Movie	0.7
AMERTL-2049 Hals Marke	t Slamming Protectio	Chicago*	WGN	24-Jan-99	21:07	9 PM Local News	1.7
AMERTL-2049 Hals Marke	t Slamming Protectio	Chicago*	WGN	30-Jan-99	18:19	Friends	2.3
AMERTL-2049 Hals Marke	t Slamming Protectio	Chicago*	WGN	1-Feb-99	21:09	9 PM Local News	2.3
AMERTL-2049 Hals Marke	t Slamming Protectio	Chicago*	WGN	5-Feb-99	21:10	Sports Special	4.8
AMERTL-2049 Hals Marke	t Slamming Protectio	Chicago*	WGN	9-Feb-99	20:33	Hyperion Bay	2.4
AMERTL-2049 Hals Marke	t Slamming Protectio	Chicago*	WGN	9-Feb-99	21:44	9 PM Local News	2
AMERTL-2049 Hals Marke	t Slamming Protectio	Chicago*	WGN	11-Feb-99	19:27	Bulls Eye	1.4
AMERTL-2049 Hals Marke	t Slamming Protectio	Chicago*	WGN	12-Feb-99	21:54	9 PM Local News	2.1

AMERICA OLD HELE MERICA OLD HELE OLD HELE	1460	40 5 1 00	Attachment "AG-I	I"
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WGN	13-Feb-99	17:50 Friends	1.5
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WGN	13-Feb-99	21:14 9 PM Local News	2.3
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WGN	15-Feb-99	21:54 9 PM Local News	2.7
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WGN	17-Feb-99	21:15 9 PM Local News	2.7
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WGN	19-Feb-99	19:10 Basketball: Chicago Bulls	2.3
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WGN	19-Feb-99	21:49 9 PM Local News	2
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WGN	20-Feb-99	21:46 9 PM Local News	2.8
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WGN	23-Feb-99	21:35 9 PM Local News	1.7
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WGN	25-Feb-99	21:43 9 PM Local News	1.9
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WGN	27-Feb-99	19:33 Basketball: Chicago Bulls	1.8
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WGN	28-Feb-99	21:21 9 PM Local News	2.8
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WGN	3-Mar-99	21:31 9 PM Local News	1.8
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WGN	4-Mar-99	21:14 9 PM Local News	2.4
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WGN	6-Mar-99	21:12 9 PM Local News	3.1
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WGN	6-Mar-99	21:30 9 PM Local News	1.6
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WGN	7-Mar-99	21:55 9 PM Local News	2.8
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WGN	11-Маг-99	21:26 Basketball: Chicago Bulls	2.9
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WLS	18-Jan-99	8:39 Good Morning America	1.2
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WLS	19-Jan-99	18:56 Wheel Of Fortune	6.9
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WLS	19-Jan-99	19:01 Wheel Of Fortune	8.9
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WLS	21-Jan-99	19:57 Vengeance Unlimited	7.1
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WLS	23-Jan-99	18:57 Wheel Of Fortune	4.9
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WLS	24-Jan-99	21:44 The Practice	9.6
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WLS	26-Jan-99	18:20 6 PM Local News	5.5
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WLS	26-Jan-99	18:52 Wheel Of Fortune	6.6
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WLS	27-Jan-99	7:46 Good Morning America	1
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WLS	29-Jan-99	18:51 Wheel Of Fortune	6.3
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WLS	1-Feb-99	22:07 10 PM Local News	7.7
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WLS	2-Feb-99	16:22 4PM Local News	3.3
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WLS	13-Feb-99	21:31 Figure Skating	7.6
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WLS	14-Feb-99	22:11 10 PM Local News	9.8
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WLS	18-Feb-99	18:57 Wheel Of Fortune	6.8
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WLS	20-Feb-99	22:24 10 PM Local News	4.7
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WLS	1-Mar-99	18:58 Wheel Of Fortune	7.3
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WLS	5-Mar-99	16:12 4PM Local News	4.1
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WLS	6-Mar-99	22:22 10 PM Local News	5.4
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WLS	8-Mar-99	21:32 ABC News Special	6.7
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WLS	13-Mar-99	22:15 10 PM Local News	6.7
AMERTL-2049 Hals Market Slamming Protectio Chicago*	WLS	14-Mar-99	10:25 This Week	1

#### MCI WorldCom v. Illinois Bell Docket No. 01-0412 Exhibit 2.1 Attachment "AG-H"

AMERTL-2049	Hals Market Slamming Protectio Chicago*	WMAQ	21-Jan-99 °	7:11 4:30 PM Local News	1.8
AMERTL-2049	Hals Market Slamming Protectio Chicago*	WMAQ	21-Jan-99 2	22:12 10 PM Local News	9.7
AMERTL-2049	Hals Market Slamming Protectio Chicago*	WMAQ	23-Jan-99 2	22:26 10 PM Local News	6
AMERTL-2049	Hals Market Slamming Protectio Chicago*	WMAQ	26-Jan-99	8:57 Access Hollywood	1.8
AMERTL-2049	Hals Market Slamming Protectio Chicago*	WMAQ	26-Jan-99 2	20:45 Will And Grace	8.4
AMERTL-2049	Hals Market Slamming Protectio Chicago*	WMAQ	30-Jan-99	7:26 5 PM Local News	1.2
AMERTL-2049	Hals Market Slamming Protectio Chicago*	WMAQ	30-Jan-99	8:53 Access Hollywood	2.2
AMERTL-2049	Hals Market Slamming Protectio Chicago*	WMAQ	30-Jan-99 2	21:25 Profiler	4.4
AMERTL-2049	Hals Market Slamming Protectio Chicago*	WMAQ	31-Jan-99	7:22 5 PM Local News	0.7
AMERTL-2049	Hals Market Slamming Protectio Chicago*	WMAQ	5-Feb-99 2	22:07 10 PM Local News	4.2
AMERTL-2049	Hals Market Slamming Protectio Chicago*	WMAQ	6-Feb-99	18:57 Access Hollywood	1.9
AMERTL-2049	Hals Market Slamming Protectio Chicago*	WMAQ	6-Feb-99 2	20:45 The Pretender	7.1
AMERTL-2049	Hals Market Slamming Protectio Chicago*	WMAQ	7-Feb-99 2	21:27 Movie: The Sixties	14
AMERTL-2049	Hals Market Slamming Protectio Chicago*	WMAQ	8-Feb-99	17:10 4:30 PM Local News	1.2
AMERTL-2049	Hals Market Stamming Protectio Chicago*	WMAQ	13-Feb-99	18:56 Chicagoing With Bill Campbell	2.5
AMERTL-2049	Hals Market Slamming Protectio Chicago*	WMAQ	13-Feb-99 2	21:58 Profiler	6
AMERTL-2049	Hals Market Slamming Protectio Chicago*	WMAQ	14-Feb-99	9:29 9 AM Local News	0.6
AMERTL-2049	Hals Market Slamming Protectio Chicago*	WMAQ	15-Feb-99 2	20:34 Movie: To Serve and Protect	7.8
AMERTL-2049	Hals Market Slamming Protectio Chicago*	WMAQ	17-Feb-99 2	20:12 Confirmation: The Hard Evidence of Aliens Amon	9.3
AMERTL-2049	Hals Market Slamming Protectio Chicago*	<b>WMAQ</b>	22-Feb-99 2	22:25 10 PM Local News	5
AMERTL-2049	Hals Market Slamming Protectio Chicago*	WMAQ	11-Mar-99	22:19 10 PM Local News	6.9
AMERTL-2049	Hals Market Slamming Protectio Chicago*	WMAQ	18-Mar-99	22:29 10 PM Local News	8.3

## MCI WorldCom v. Illinois Bell Docket No. 01-0412 Exhibit 2.1 COST Attachment "AG-H"

MASTERCOD TITLE PRODUCT_NAME GEO_NAME	STATION_NAM	AIR_DATE A	AIR_TIME	PROGRAM_NAME	COST
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WBBM	1-Dec-99	17:29	5 PM Local News	1.9
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WBBM	2-Dec-99	22:25	10 PM Local News	3.6
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WBBM	3-Dec-99	17:28	5 PM Local News	1.3
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WBBM	7-Dec-99	20:55	60 Mintues II	9.7
AMERTL-2392 Hals Market   Slamming Protectio Chicago*	WBBM	8-Dec-99	17:14	5 PM Local News	1.2
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WBBM	9-Dec-99	22:22	10 PM Local News	3.6
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WBBM	10-Dec-99	22:30	10 PM Local News	0.5
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WBBM	14-Dec-99	20:38	60 Mintues II	6.4
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WBBM	14-Dec-99	22:10	10 PM Local News	5.3
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WBBM	15-Dec-99	22:30	10 PM Local News	1.1
AMERTL-2392 Hals Market   Slamming Protectio Chicago*	WFLD	11-Nov-99	21:22	9 PM Local News	7.1
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WFLD	12-Nov-99	22:02	9 PM Local News	4.5
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WFLD	3-Dec-99	7:55	Fox: Thing In The Morni	0.6
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WFLD	8-Dec-99	8:39	Fox: Thing In The Morni	0.5
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WFLD	8-Dec-99	22:04	9 PM Local News	3.8
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WFLD	13-Dec-99	19:01	Seinfeld	4
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WFLD	15-Dec-99	8:15	Fox: Thing In The Morni	0.6
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WFLD	16-Dec-99	21:24	9 PM Local News	5.6
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WGN	5-Nov-99	21:14	9 PM Local News	2.1
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WGN	9-Nov-99	21:18	9 PM Local News	2
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WGN	10-Nov-99	19:55	10 PM Local News	2.9
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WLS	27-Oct-99	17:10	5 PM Local News	3.5
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WLS	28-Oct-99		4 PM Local News	2.3
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WLS	29-Oct-99		10 PM Local News	7.8
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WLS	13-Dec-99		5 PM Local News	4
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WLS	14-Dec-99		6 PM Local News	5.6
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WLS	15-Dec-99		6 PM Local News	5.8
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WMAQ	3-Nov-99		4:30 PM Local News	1.3
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WMAQ	5-Nov-99		1 PM Local News	5.8
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WMAQ	9-Nov-99		10 PM Local News	2.7
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WMAQ	29-Nov-99		Dateline NBC-Weekday	10.1
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WMAQ	1-Dec-99		4:30 PM Local News	1.6
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WMAQ	1-Dec-99		6 PM Local News	2.9
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WMAQ	1-Dec-99		10 PM Local News	9.3
AMERTL-2392 Hals Market   Slamming Protectio Chicago*	WMAQ	3-Dec-99		4:30 PM Local News	1.6
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WMAQ	8-Dec-99		9 PM Local News	1.3
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WMAQ	10-Dec-99		10 PM Local News	5
AMERTL-2392 Hals Market I Slamming Protectio Chicago*	WMAQ	11-Dec-99	22:09	10 PM Local News	3.5

AMERTL-2392 Hals Market I Slamming Protectio Chicago\*

WMAQ

13-Dec-99

22:11 10 PM Local News

Attachment "AG-H"

MASTERCOD TITLE PRODUCT_NAME	GEO NAME	STATION_NAM	AIR DATE AIR	TIME	PROGRAM_NAME Exhibit 2.1
AMERTL-2050 House Slammin Slamming Protection		WBBM	20-Jan-99		60 Mintues II Attachment "AG-I"
AMERTL-2050 House Slammin Slamming Protection	~	WBBM	20-Jan-99		60 Mintues II
AMERTL-2050 House Slammin Slamming Protection	•	WBBM	20-Jan-99	22:25	10 PM Local News
AMERTL-2050 House Slammin Slamming Protection	_	WBBM	31-Jan-99		10 PM Local News
AMERTL-2050 House Slammin Slamming Protection		WBBM	7-Feb-99		Touched By An Angel
AMERTL-2050 House Slammin Slamming Protection	•	WBBM	8-Feb-99		4:30 PM Local News
AMERTL-2050 House Slammin Slamming Protection	-	WBBM	9-Feb-99		4:30 PM Local News
AMERTL-2050 House Slammin Slamming Protection	-	WBBM	14-Feb-99		Movie: Deep in My Heart
AMERTL-2050 House Slammin Slamming Protection	_	WBBM	19-Feb-99		Kids Say The Darndest Things
AMERTL-2050 House Slammin Slamming Protection	_	WBBM	20-Feb-99		Siskel & Ebert
AMERTL-2050 House Slammin Slamming Protection	-	WBBM	20-Feb-99		Walker, Texas Ranger
AMERTL-2050 House Slammin Slamming Protection	•	WBBM	23-Feb-99		Entertainment Tonight
AMERTL-2050 House Slammin Slamming Protection	_	WBBM	26-Feb-99		Entertainment Tonight
AMERTL-2050 House Slammin Slamming Protection	Chicago*	WBBM	27-Feb-99	19:59	Early Edition
AMERTL-2050 House Slammin Slamming Protection	Chicago*	WBBM	5-Dec-99	19:46	Touched By An Angel
AMERTL-2050 House Slammin Slamming Protection	Chicago*	WBBM	5-Dec-99	21:14	Sunday Night Movie
AMERTL-2050 House Slammin Slamming Protection	Chicago*	WFLD	24-Jan-99	18:39	World's Funniest!
AMERTL-2050 House Slammin Slamming Protection	Chicago*	WFLD	25-Jan-99	20:01	Melrose Place
AMERTL-2050 House Slammin Slamming Protection	Chicago*	WFLD	26-Jan-99	20:34	Guinness World Records
AMERTL-2050 House Slammin Slamming Protection	Chicago*	WFLD	26-Jan-99	20:43	Guinness World Records
AMERTL-2050 House Slammin Slamming Protection	Chicago*	WFLD	2-Feb-99	7:52	Fox: Thing In The Morning
AMERTL-2050 House Slammin Slamming Protection	Chicago*	WFLD	12-Feb-99		Fox: Thing In The Morning
AMERTL-2050 House Slammin Slamming Protection		WFLD	14-Feb-99		World's Funniest
AMERTL-2050 House Slammin Slamming Protection	_	WFLD	14-Feb-99		9 PM Local News
AMERTL-2050 House Slammin Slamming Protection		WFLD	19-Feb-99	19:43	X-Fíles
AMERTL-2050 House Slammin Slamming Protection		WFLD	19-Feb-99		Millennium
AMERTL-2050 House Stammin Stamming Protection	-	WFLD	21-Feb-99	18:31	World's Funniest
AMERTL-2050 House Slammin Slamming Protection	-	WFLD	26-Feb-99		Movie: Seven
AMERTL-2050 House Slammin Slamming Protection	_	WFLD	2-Mar-99		Opening the Lost Tombs: Live From Egypt
AMERTL-2050 House Slammin Slamming Protection	_	WFLD	7-Mar-99		The Simpsons
AMERTL-2050 House Stammin Stamming Protection	-	WGN	19-Jan-99		Buffy The Vampire Slayer
AMERTL-2050 House Slammin Slamming Protection	-	WGN	23-Jan-99		Saturday Night Movie
AMERTL-2050 House Slammin Slamming Protection	_	WGN	24-Jan-99		9 PM Local News
AMERTL-2050 House Slammin Slamming Protection	-	WGN	25-Jan-99		Seventh Heaven (Weekday)
AMERTL-2050 House Slammin Slamming Protection		WGN	25-Jan-99		9 PM Local News
AMERTL-2050 House Slammin Slamming Protection		WGN	29-Jan-99		Friday Night Movie
AMERTL-2050 House Slammin Slamming Protection	_	WGN	1-Feb-99		Seventh Heaven (Weekday)
AMERTL-2050 House Slammin Slamming Protection	Chicago*	WGN	1-Feb-99	20:14	Hyperion Bay

AMEDII 2050 Haves Oleveri Oleveri Delegari	14/01/	4 5 1 00	22.25.11	Exhibit 2.1
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WGN	1-Feb-99	20:35 Hyperion Bay	Attachment "AG-I"
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WGN	7-Feb-99	12:49 Sunday Afternoon Movie	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WGN	7-Feb-99	17:56 Sunday Afternoon Movie	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WGN	11-Feb-99	20:09 Bulls Eye	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WGN	13-Feb-99	12:16 Chicago Auto Show	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WGN	13-Feb-99	20:07 Saturday Night Movie	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WGN	1 <b>4-F</b> eb-99	21:15 9 PM Local News	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WGN	15-Feb-99	20:33 Hyperion Bay	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WGN	15-Feb-99	20:57 Hyperion Bay	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WGN	16-Feb-99	20:57 Felicity	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WGN	19-Feb-99	19:24 Basketball: Chicago Bulls	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WGN	20-Feb-99	19:50 Saturday Night Movie	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WGN	24-Feb-99	20:27 Dawson's Creek	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WGN	25-Feb-99	20:58 Turks	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WGN	26-Feb-99	19:50 Friday Night Movie	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WGN	6-Mar-99	18:08 Friends	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WGN	7-Mar-99	17:56 Black Forum	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WGN	7-Mar-99	19:49 Smart Guy	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WGN	12-Mar-99	20:16 Basketball: Chicago Bulls	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WGN	5-Apr-99	21:54 9 PM Local News	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WGN	5-Nov-99	19:18 Jamie Foxx Show	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WLS	20-Jan-99	18:42 Wheel Of Fortune	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WLS	20-Jan-99	20:14 Drew Carey	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WLS	24-Jan-99	22:10 10 PM Local News	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WLS	25-Jan-99	18:49 Wheel Of Fortune	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WLS	25-Jan-99	20:51 Movie: My Last Love	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WLS	26-Jan-99	16:50 4PM Local News	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WLS	26-Jan-99	18:32 Wheel Of Fortune	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WLS	26-Jan-99	22:17 10 PM Local News	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WLS	29-Jan-99	18:31 Wheel Of Fortune	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WLS	31-Jan-99	18:19 Movie: Muppet Treasure Is	sland
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WLS	2-Feb-99	8:17 Good Morning America	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WLS	8-Feb-99	22:25 10 PM Local News	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WLS	14-Feb-99	19:29 Wonderful World of Disney	r: Cinderella
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WLS	18-Feb-99	20:47 Movie: Stephen King's Sto	rm of The Century
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WLS	19-Feb-99	8:39 Good Morning America	<del>-</del>
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WLS	20-Feb-99	20:58 Movie: A Very Brady Sequ	el
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WLS	20-Feb-99	21:30 Love American Style	
AMERTL-2050 House Slammin Slamming Protectio Chicago*	WLS	22-Feb-99	7:55 Good Morning America	
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AMERTL-2050 H	House Slammin Slamming Protection	Chicago*	WLS	23-Feb-99	7:18	Good Morning America	Attachment "AG-I"
AMERTL-2050 H	House Slammin Slamming Protection	Chicago*	WLS	25-Feb-99	21:58	Vengeance Unlimited	Attachment
AMERTL-2050 H	House Slammin Slamming Protection	Chicago*	WLS	27-Feb-99	20:29	Movie: Up Close & Personal	
AMERTL-2050 H	House Slammin Slamming Protection	Chicago*	WLS	6-Mar-99	18:58	Wheel Of Fortune	
AMERTL-2050 H	House Slammin Slamming Protection	Chicago*	WLS	30-Mar-99	16:51	4PM Local News	
AMERTL-2050 H	House Slammin Slamming Protection	Chicago*	WMAQ	22-Jan-99	22:18	10 PM Local News	
AMERTL-2050 H	House Slammin Slamming Protection	Chicago*	WMAQ	23-Jan-99	21:22	Figure Skating: The World Pro	ofessional Champio
AMERTL-2050 H	House Slammin Slamming Protection	Chicago*	WMAQ	26-Jan-99	22:29	10 PM Local News	
AMERTL-2050 H	House Slammin Slamming Protection	Chicago*	WMAQ	31-Jan-99	18:36	Movie: Clueless	
AMERTL-2050 H	House Slammin Slamming Protection	Chicago*	WMAQ	31-Jan-99	19:37	Movie: Clueless	
AMERTL-2050 H	House Slammin Slamming Protection	Chicago*	WMAQ	31-Jan-99	20:58	Movie: Miami Rhapsody	
AMERTL-2050 H	House Slammin Slamming Protection	Chicago*	WMAQ	7-Feb-99	20:37	Movie: The Sixties	
AMERTL-2050 H	House Slammin Slamming Protection	Chicago*	WMAQ	8-Feb-99	20:33	Movie: The Sixties	
AMERTL-2050 H	House Slammin Slamming Protection	Chicago*	WMAQ	13-Feb-99	20:46	The Pretender	
AMERTL-2050 H	House Slammin Slamming Protection	Chicago*	WMAQ	13-Feb-99	21:12	Profiler	
AMERTL-2050 I	House Slammin Slamming Protection	Chicago*	WMAQ	13-Feb-99	22:27	10 PM Local News	
AMERTL-2050 F	House Slammin Slamming Protection	Chicago*	WMAQ	14-Feb-99	22:23	10 PM Local News	
AMERTL-2050 H	House Slammin Slamming Protection	Chicago*	WMAQ	11-Mar-99	22:07	10 PM Local News	
AMERTL-2050 H	House Slammin Slamming Protection	Chicago*	WMAQ	29-Mar-99	18:57	Access Hollywood	

MASTERCOD TITLE	PRODUCT_NAME	GEO_NAME	STATION_NAM	AIR_DATE A	AIR_TIME	PROGRAM_NAME	Atı
AMERTL-2393 House Slamming			WBBM	9-Nov-99	_	Entertainment Tonight	1 841
AMERTL-2393 House Slamming	Slamming Protectio	Chicago*	WBBM	6-Dec-99	17:22	5 PM Local News	
AMERTL-2393 House Slamming	Slamming Protectio	Chicago*	WBBM	12-Dec-99	21:01	Touched By An Angel	
AMERTL-2393 House Slamming	Slamming Protectio	Chicago*	WFLD	30-Oct-99	21:20	9 PM Local News	
AMERTL-2393 House Slamming			WFLD	13-Nov-99	21:37	10 PM Local News	
AMERTL-2393 House Slamming	_	•	WFLD	29-Nov-99	20:33	Ally McBeal	
AMERTL-2393 House Slamming	Slamming Protectio	Chicago*	WFLD	2-Dec-99	21:49	9 PM Local News	
AMERTL-2393 House Slamming			WFLD	3-Dec-99	21.44	9 PM Local News	
AMERTL-2393 House Slamming	Slamming Protectio	Chicago*	WFLD	6-Dec-99	20:46	Ally	
AMERTL-2393 House Slamming			WFLD	6-Dec-99	22:01	9 PM Local News	
AMERTL-2393 House Slamming	Slamming Protectio	Chicago*	WFLD	8-Dec-99	21:28	9 PM Local News	
AMERTL-2393 House Slamming	Slamming Protectio	Chicago*	WFLD	9-Dec-99	8:59	Fox: Thing In The Morning	
AMERTL-2393 House Slamming	Slamming Protectio	Chicago*	WFLD	13-Dec-99		Fox: Thing In The Morning	
AMERTL-2393 House Slamming			WFLD	14-Dec-99		9 PM Local News	
AMERTL-2393 House Slamming	Slamming Protectio	Chicago*	WFLD	15-Dec-99	21:32	9 PM Local News	
AMERTL-2393 House Slamming	Slamming Protectio	Chicago*	WFLD	18-Dec-99	17:59	Third Rock From The Sun	
AMERTL-2393 House Slamming	Slamming Protectio	Chicago*	WFLD	18-Dec-99	18:52	King Of The Hill	
AMERTL-2393 House Slamming	Slamming Protectio	Chicago*	WGN	25-Oct-99	20:34	Safe Harbor	
AMERTL-2393 House Slamming	Slamming Protectio	Chicago*	WGN	30-Oct-99	19:36	Saturday Night Movie	
AMERTL-2393 House Slamming	Slamming Protectio	Chicago*	WGN	30-Oct-99	19:56	Saturday Night Movie	
AMERTL-2393 House Slamming	Slamming Protectio	Chicago*	WGN	30-Oct-99	20:28	Saturday Night Movie	
AMERTL-2393 House Slamming	Slamming Protectio	Chicago*	WGN	30-Oct-99	20:49	Saturday Night Movie	
AMERTL-2393 House Slamming	Slamming Protectio	Chicago*	WGN	31-Oct-99	20:32	Jack And Jili	
AMERTL-2393 House Slamming	Slamming Protectio	Chicago*	WGN	8-Nov-99	20:59	Safe Harbor	
AMERTL-2393 House Slamming			WLS	7-Dec-99	17:12	5 PM Local News	
AMERTL-2393 House Slamming	Slamming Protectio	Chicago*	WLS	8-Dec-99	17:32	5 PM Local News	
AMERTL-2393 House Slamming	Slamming Protectio	Chicago*	WLS	13-Dec-99	18:11	6 PM Local News	
AMERTL-2393 House Slamming	Slamming Protectio	Chicago*	WLS	14-Dec-99	16:57	4PM Local News	
AMERTL-2393 House Slamming	Slamming Protectio	Chicago*	WLS	14-Dec-99	19:18	Spin City	
AMERTL-2393 House Slamming	Slamming Protectio	Chicago*	WLS	15-Dec-99		Two Guys And A Girl	
AMERTL-2393 House Slamming	Slamming Protectio	Chicago*	WLS	19-Dec-99	9:04	9 AM Local News	
AMERTL-2393 House Slamming	Slamming Protectio	Chicago*	WLS	19-Dec-99	22:17	10 PM Local News	
AMERTL-2393 House Slamming	Slamming Protectio	Chicago*	WLS	10-Jan-00	20:22	Wheel Of Fortune	
AMERTL-2393 House Slamming	Slamming Protectio	Chicago*	WMAQ	30-Oct-99	21:34	Profiler	
AMERTL-2393 House Slamming	Slamming Protectio	Chicago*	WMAQ	13-Nov-99	21:33	Profiler	
AMERTL-2393 House Slamming	Slamming Protectio	Chicago*	WMAQ	30-Nov-99	16:40	4:30 PM Local News	
AMERTL-2393 House Slamming	Slamming Protectio	Chicago*	WMAQ	30-Nov-99	18:15	6 PM Local News	
AMERTL-2393 House Slamming	Slamming Protectio	Chicago*	WMAQ	6-Dec-99	16:46	9 PM Local News	
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AMERTL-2393 House Slamming Slamming Protectio Chicago\* AMERTL-2393 House Slamming Slamming Protectio Chicago\* WMAQ WMAQ

7-Dec-99 19-Dec-99 22:15 10 PM Local News 22:14 10 PM Local News Attachment "AG-I"

MCI WorldCom v. Illinois Bell Docket No. 01-0412 Exhibit 2.1 Attachment "AG-K"

You've secured everything from your business' files to its web site.

#### Think. Is there anything you missed?



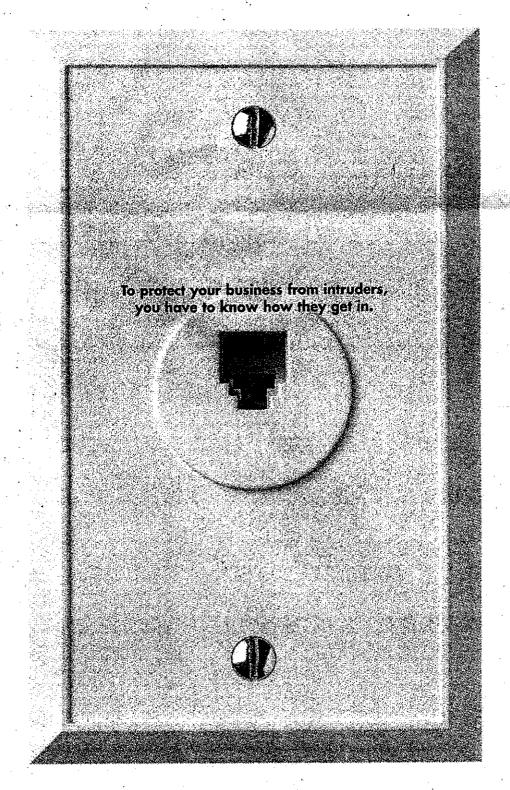
tast year, thousands of businesses had their local tall service switched without their knowledge. It's called skirmning. It's illegal. And it can happen to any business. Including yours. To learn more about slamming and how to protect your business, visit our web site at www.ameritech.com/slamming.

For free slamming protection, call Ameritech at 1-888-779-SLAM.

in a world of technology, people make the difference. ATTICTITECH.



**AD CODE: AMERTL-2094** 



They use the phone. As a result, thousands of businesses had their local toll service switched last year without their knowledge. It's called slamming. It's illegal. And it can happen to any business. Including yours. To learn more about slamming and how to protect your business, visit our web site at www.ameritech.com/slamming.

For free slamming protection, call Ameritech at 1-888-779-SLAM.

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MCI WorldCom v. Illinois Bell

Docket No. 01-0412

Attachment "AG-L"

MCI WorldCom v. Illmois Beil Docket No. 01-0412 Exhibit 2.1 Attachment "AG-M"

MASTERCOD PRODUCT_NAME	DATE_FIRST_RU GEO_NAM	PUBLICATION_NAME	INSERTION_DAT EDITIO AD_SIZE COLO	COST
AMERTL-2094 Slamming Protection	11-Feb-99 Chicago*	Chicago Sun-Times	11-Feb-99 FULL RU 5x14	25.1
AMERTL-2094 Slamming Protection	11-Feb-99 Chicago*	Chicago Tribune	11-Feb-99 FULL RU 5x14	26.2
AMERTL-2094 Slamming Protection	11-Feb-99 Chicago*	Chicago Tribune	22-Feb-99 FULL RU 5x14	26.2
AMERTL-2094 Slamming Protection	11-Feb-99 Chicago*	Chicago Tribune	24-Feb-99 FULL RU 5x14	26.2
AMERTL-2094 Slamming Protection	11-Feb-99 Chicago*	Chicago Tribune	25-Feb-99 FULL RU 5x14	26.2
AMERTL-2094 Slamming Protection	11-Feb-99 Milwaukee	Milwaukee Business Journ	12-Feb-99 FULL RU Cover	3.7
AMERTL-2094 Slamming Protection	11-Feb-99 Milwaukee	Milwaukee Journal Sentine	11-Feb-99 FULL RU 5x14	5.7
AMERTL-2103 Slamming Protection-Busine	s 15-Feb-99 Chicago*	Chicago Sun-Times	23-Feb-99 FULL RU 5x14	25.1
AMERTL-2103 Slamming Protection-Busine	s 15-Feb-99 Chicago*	Chicago Sun-Times	25-Feb-99 FULL RU 5x14	25.1
AMERTL-2103 Slamming Protection-Busine	s 15-Feb-99 Chicago*	Chicago Tribune	15-Feb-99 FULL RU 5x14	26.2
AMERTL-2103 Slamming Protection-Busine	s 15-Feb-99 Chicago*	Wall Street Journal	22-Feb-99 CHICAG 1776	11.5
AMERTL-2103 Slamming Protection-Busine	s 15-Feb-99 Milwaukee	Milwaukee Business Journ	19-Feb-99 FULL RU Full	3.7
AMERTL-2103 Slamming Protection-Busine	s 15-Feb-99 Milwaukee	Milwaukee Journal Sentine	15-Feb-99 FULL RU 5x14	5.7
AMERTL-2103 Slamming Protection-Busine	s 15-Feb-99 Milwaukee	Milwaukee Journal Sentine	18-Feb-99 FULL RU 5x14	5.7
AMERTL-2103 Slamming Protection-Busine	s 15-Feb-99 Milwaukee	Milwaukee Journal Sentine	22-Feb-99 FULL RU 5x14	5.7



MCI WorldCom v. Illinois Bell Docket No. 01-0412 Exhibit 2.1 Attachment "AG-N"

### **Electronic Authorization**

**Operational Test Results** 

September 4, 2001

# Electronic Authorization: Allows Customers To Directly Notify LEC to Lift PIC Freeze

MCI WorldCom v. Illinois Bell Docket No. 01-0412 Exhibit 2.1 Attachment "AG-N"

- 1. Customer authorizes PIC freeze lift via electronic voice recording
- 2. Independent company makes all recordings available for local phone company review
- 3. Local phone company hears authorization and processes order

### **Electronic Authorization Process**

Customer Requests IXC InterLATA or IntraLATA PIC Change

+

 Confirms Customer Wants ILEC To Lift Any PIC Freeze On The Account

#### EA

Independent Company Verifies
 Customer Wants ILEC To Lift Any PIC
 Freeze On Customer Acct



 Verifies Customer Requests That Their Taped Authorization Be Transmitted to ILEC If Required

If No.

**Existing Process Followed** 

#### EA Language:

•"Ma'am/Sir, some customers have a PIC freeze or PIC restriction on their account that does not allow any changes to be made. You may have this feature even if you are not aware of it.

The following question is related to change restrictions you may have on your account:

Can a recording of this call be made available to your local phone company as your authorization to remove any PIC Freeze that may be on your account?"

•Identity verification information including last 4 digits of social security number also procured

If Yes and PIC Frozen,

- .wav Audio File (or similar) of Taped Customer Authorization Made Available to ILEC to Process the Order

### **EA Test Objectives**

- 1. Understand consumer acceptance of electronic voice recordings being made available to the LEC as authorization
- 2. Assess technical process of collection and transmission of digitally recording electronic authorizations to LEC
- 3. Determine overall success rate of resulting PIC changes to MCI

## Most Consumers Embraced New Method For Lifting

PIC Freeze

MCI WorldCom v. Illinois Bell Docket No. 01-0412 Exhibit 2.1 Attachment "AG-N"

 94% of customers in the test agreed to use EA and allow a recording of their authorization be made available to their LEC to remove the PIC Freeze on their account

Total Results of Test			<u>Customers</u>	Percent of Orders		
•	PIC Freeze rejects in test		204			
•	Customer did not agree to EA		11	6%		
•	Customer agreed to use EA		193	94%		
E	A Approval		Customers	Percent of Orders		
•	EA forwarded to LEC		160	78%		
•	EA not forwarded to LEC		44	22%		
•	<ul> <li>EA not forwarded to LEC</li> <li>Customer did not agree to EA</li> <li>Recording Quality (Vol or Static)</li> <li>Customer Confused -</li> <li>Outdated WAV File -</li> </ul>	11 (25%) 9 (20%) 4 ( 9%) 8 (18%) 12 (27%)	44	22%		

# LEC Processing Results Also Show the Test to be a Success MCI WorldCom v.

MCI WorldCom v. Illinois Bell Docket No. 01-0412 Exhibit 2.1 Attachment "AG-N"

LE	C Processing Results		Customers	Percent of Orders Sent	
•	EA request processed		90	56%	
•	EA request not processed		70	44%	
	<ul> <li>PIC change to MCI completed prior to EA</li> </ul>	40 (25%)			
	<ul> <li>PIC change to other carrier prior to EA</li> </ul>	11 ( 7%)			
	<ul> <li>EA not processed</li> </ul>	19 (12%)			
	<ul> <li>Disconnected number or party provi</li> </ul>	ding			
	EA was not on the account				
•	Total customers with MCl after test	concluded	130	81%	

## Test Technically Successful

- Test proved transfer and review of digitally recorded .WAV files technically sound
- Only required off-the-shelf software to review EA files
- PIC change orders verified as successful and confirmation transactions received via standard (CARE) interface

### Consumer Benefits Realized During Test

- Consumer Satisfaction
  - Consumer expectations met
  - No need to participate in multiple phone calls
- Consumer Protection
  - The customer's PIC freeze protection is not compromised because the ILEC actually heard the consumer's oral request